

MCCORRISTON MILLER MUKAI MACKINNON LLP

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Attorneys for Defendant
REVENUE CYCLE MANAGEMENT,
LLC d/b/a REVENUE CYCLE
MANAGEMENT OF HAWAII

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

JUSTEN PALEKA,)	CIVIL NO. 13-00595 HG KSC
)	
Plaintiff,)	DEFENDANT REVENUE CYCLE
)	MANAGEMENT, LLC d/b/a
vs.)	REVENUE CYCLE
)	MANAGEMENT OF HAWAII’S
REVENUE CYCLE MANAGEMENT,)	INITIAL DISCLOSURES;
LLC d/b/a REVENUE CYCLE)	CERTIFICATE OF SERVICE
MANAGEMENT OF HAWAII,)	
)	
Defendant.)	
)	

DEFENDANT REVENUE CYCLE MANAGEMENT, LLC d/b/a REVENUE
CYCLE MANAGEMENT OF HAWAII’S INITIAL DISCLOSURES

Defendant REVENUE CYCLE MANAGEMENT, LLC d/b/a REVENUE
CYCLE MANAGEMENT OF HAWAII (“Defendant”), by and through its

attorneys, McCorriston Miller Mukai MacKinnon LLP, hereby submits the following as its Initial Disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

I. WITNESSES

Based on the information reasonably available at this time, Defendant believes that the following individuals may have discoverable information relevant to Defendant's defenses to the claims asserted by Plaintiff Justen Paleka ("Plaintiff"):

1. Daniel Robinson
c/o McCorriston Miller Mukai MacKinnon LLP
Five Waterfront Plaza, Fourth Floor
500 Ala Moana Boulevard
Honolulu, Hawai'i 96813

Subject(s) of knowledge: All issues relevant to liability and damages.

Defendant also identifies any and all witnesses identified by Plaintiff in this litigation as well as all necessary rebuttal witnesses and custodians of records to authenticate documents and things. Defendant reserves the right to identify other persons with non-privileged knowledge to support its defenses in this matter as are revealed in the course of ongoing investigation and discovery.

II. IDENTIFICATION OF DOCUMENTS

Defendant identifies the following categories of documents they have in their possession, custody, or control that may be relevant to the disputed facts:

1. All pleadings in the lawsuit underlying Plaintiff's claims.
2. All documents and records of Defendant related to the collection of moneys from Plaintiff.

Defendant reserves the right to amend and supplement this disclosure as necessary.

III. COMPUTATION OF DAMAGES

Defendant has no information as yet regarding the cost and/or damages in the underlying lawsuit.

Defendant may seek recovery of its reasonable attorneys' fees and costs in an amount to be shown at trial.

IV. IDENTIFICATION OF INSURANCE AGREEMENTS

Pursuant to Rule 26(a)(1)(A)(iv) of the Federal Rules of Civil Procedure, an insurance policy with Travelers Bond and Financial Products is available for inspection at the offices of McCorriston Miller Mukai MacKinnon LLP upon request.

V. LIMITATIONS

Nothing in these Initial Disclosures shall constitute a waiver of any claim, whether procedural or substantive, including: any applicable privilege, including the attorney-client privilege, the work-product doctrine, or any other privilege; and

the right to object to discovery requests that are not relevant or sufficiently relevant to justify the burden or expense of response.

Nothing in these Initial Disclosures shall constitute an admission or concession on the part of Defendant with respect to any issues of fact or law.

Pursuant to Rule 26(g)(1) of the Federal Rules of Civil Procedure, the undersigned certifies that, to the best of his knowledge, information, and belief, formed after a reasonable inquiry, this Initial Disclosure is complete and correct.

DATED: Honolulu, Hawai'i, December 30, 2013

/s/ David J. Minkin

DAVID J. MINKIN

DAVID D. DAY

Attorneys for Defendant
REVENUE CYCLE MANAGEMENT,
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JUSTEN PALEKA,)	CIVIL NO. 13-00595 HG KSC
)	
Plaintiff,)	CERTIFICATE OF SERVICE
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vs.)	
)	
REVENUE CYCLE MANAGEMENT,)	
LLC d/b/a REVENUE CYCLE)	
MANAGEMENT OF HAWAII,)	
)	
Defendant.)	
)	
)	
)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing document was duly served upon the following persons either by electronic court filing (ECF), hand delivery (HD) or by mailing said copy, postage prepaid, first class, in a United States post office at Honolulu, Hawaii (M), in the manner indicated, addressed as set forth below:

Served Electronically through CM/ECF:

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Attorneys for Plaintiffs

DATED: Honolulu, Hawai'i, December 30, 2013

/s/ David J. Minkin

DAVID J. MINKIN

DAVID D. DAY

Attorneys for Defendant
REVENUE CYCLE MANAGEMENT,
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MANAGEMENT OF HAWAII